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January 11, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Notification*

GN Docket No. 17-258, *Promoting Investment in the 3550-3700 MHz Band*;

GN Docket No. 17-183, *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*; and

GN Docket No. 14-177, *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*

Dear Ms. Dortch:

On January 9th, Mike Sievert, Neville Ray, Kathleen Ham of T-Mobile and I met with Commissioner Carr and his Chief of Staff Jamie Susskind. On January 10th, Neville Ray, Kathleen Ham, Christine Kurth of T-Mobile and I met with Commissioner O’Rielly and his Chief of Staff Brooke Ericson.

In each meeting, we provided an overview of T-Mobile’s business noting, among other things, the continued strong customer growth the company has enjoyed as result of its consumer-friendly uncarrier strategy and its continued strong investment in network infrastructure and retail expansion.^{1/} T-Mobile’s LTE network now covers 322 million people, up from 315 last year, bringing coverage and competition to entirely new places. We described our rapid deployment of the 600 MHz spectrum we obtained in the Incentive Auction, with our 600 MHz network already live in 586 cities or towns. In 2018, we plan to launch more than a dozen new

^{1/} *T-Mobile Adds Over 5 Million Customers for the Fourth Year in a Row, Stock Repurchase Program Off to a Strong Start*, T-MOBILE (Jan. 9, 2018), <http://investor.t-mobile.com/file/Index?KeyFile=391695958>.

600 MHz capable smartphones, ranging from budget-friendly phones to superphones.^{2/} We further discussed T-Mobile's plan to have nationwide 5G service in the 600 MHz band by 2020.

While T-Mobile will launch 5G at 600 MHz, we also discussed the need for the Commission to make both mid- and high- band spectrum available to enable the full suite of 5G services. We discussed actions and plans by countries around the world to provide mid-band spectrum, including in the 3.5-4.2 GHz range for 5G services and the need for the Commission to move rapidly to make spectrum in this range available in the U.S. Therefore, in order to preserve U.S. leadership in wireless technologies, we urged the Commission to complete the rulemaking proceeding intended to update the regulations governing 3550-3700 MHz band and to initiate steps to auction Priority Access Licenses in that band in 2018.

Similarly, we stated that the Commission should promptly initiate a Notice of Proposed Rulemaking covering, and otherwise accelerate its consideration of, the use of the 3.7-4.2 GHz band for terrestrial mobile broadband networks. While T-Mobile recognizes the current use of that band by satellite stations, we urged the Commission to reject the current proposal of Intel and Intelsat, which would provide no assurance that the spectrum would ever be used for terrestrial broadband networks.^{3/} We discussed T-Mobile's proposal for making the band available using a combination of mechanisms based on a more straightforward auction and clearing of the band, but which also preserves an incentive for incumbents to clear spectrum. T-Mobile's proposed approach provides the certainty necessary to make the band available in a way that drives investment and deployment of services. Any clearing mechanisms employed must eliminate the potential for monopoly pricing or actions by a single licensee to block access to the band. We noted that T-Mobile has suggested guidelines under which the Commission may evaluate a hybrid approach to make the 3.7-4.2 GHz band available for wireless mobile broadband use.^{4/}

Finally, we discussed the need to move quickly to auction the millimeter wave bands allocated for terrestrial mobile use in the *Spectrum Frontiers* proceeding. These include the 24 GHz, 28 GHz, 37 GHz, 39 GHz and 47 GHz bands. T-Mobile is well positioned to launch 5G services in this high-band spectrum, but the Commission must act quickly to make this additional spectrum available to ensure that consumer expectations can be met. Auctioning the spectrum together is particularly important because much of the 24 GHz, 28 GHz, and 39 GHz bands is already licensed or subject to pending transactions.^{5/} Auctioning all bands together will result in a more robust and competitive auction.

^{2/} *T-Mobile #1 in Customer Satisfaction Throughout 2017*, T-MOBILE (Jan. 3, 2018), <https://newsroom.t-mobile.com/news-and-blogs/number-1-customer-satisfaction-2017.htm>.

^{3/} See Comments of Intelsat and Intel, GN Docket No. 17-183, at 16-17 (filed Oct. 2, 2017).

^{4/} See Reply Comments of T-Mobile USA, Inc., GN Docket No. 17-183, at 16-17 (filed Nov. 15, 2017).

^{5/} See *Application of Cellco Partnership d/b/a Verizon Wireless and XO Holdings For Consent to Transfer Control of Local Multipoint Distribution Service and 39 GHz Licenses*, Memorandum Opinion and Order, DA 17-1154 (rel Nov. 29, 2017) (approving transfer of 28 GHz and 39 GHz licenses from XO Holdings to Verizon); *Application of Verizon Communications Inc. and Straight Path Communications Inc. for Transfer of Control of Licenses*, ULS File No. 0007783428 (filed June 1, 2017) (seeking transfer

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Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed in the above-referenced dockets and a copy is being provided to each member of the Commission's staff with whom we met. Please direct any questions regarding this filing to me.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey

Vice President, Government Affairs
Technology and Engineering Policy

cc: (each electronically)
Hon. Michael O'Rielly
Hon. Brendan Carr
Brooke Ericson
Jamie Susskind

of 28 GHz and 39 GHz licenses from Straight Path to Verizon); Application of AT&T Mobility Spectrum LLC and FiberTower Corporation for Transfer of Control of Licenses, ULS File Nos. 0007652635 and 0007652637 (filed Feb. 13, 2017) (seeking transfer of 24 GHz and 39 GHz licenses from FiberTower to AT&T).